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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS

**OMNIBUS SEALING STIPULATION
AND ~~PROPOSED~~ ORDER
REGARDING DKT. NOS. 1197-1198
(JOINT LETTER BRIEF RE
PLAINTIFFS' RFP NOS. 16 AND 18)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

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19 Pursuant to Civil Local Rules 7-11 and 79-5, the Court's May 22, 2023 Protective Order
20 (Dkt. No. 290), and the August 1, 2023 Order Granting Motion To File Under Seal; Setting
21 Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively,
22 "YouTube") and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation
23 in connection with the Parties' Joint Letter Brief re Plaintiffs' RFP Nos. 16 and 18 and its exhibit
24 filed on October 7, 2024. Dkt. Nos. 1197-1198.

25 At this time, Plaintiffs do not oppose the sealing request and reserve all rights to
26 challenge designations and sealing in the future. Accordingly, the Parties stipulate to the
27 following chart.
28

I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR PROVISIONAL REDACTIONS

Dkt. No.	Description	Requested Action	Designating Party	Basis for Sealing	Whether Previously Sealed
1197	Joint Letter Brief	Maintain redactions at 2, 4	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's internal research and marketing and business strategies. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.
1197	Joint Letter Brief	Maintain redactions at 1	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to	A party has not previously sought to seal the same information.

				YouTube. <i>See</i> Chiou Decl. at 2.	
1198-3	Exhibit A to Joint Letter Brief	Maintain redactions at 16:9-10, 16-17	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Chiou Decl. at 2.	A party has not previously sought to seal the same information.

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: October 21, 2024

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Professional Corporation

By: /s/ Christopher Chiou

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DATED: October 21, 2024

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Plaintiffs' Steering Committee Membership

Attorneys for Plaintiffs

ATTESTATION

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 21, 2024

By: /s/ Christopher Chiou
Christopher Chiou

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:
ALL ACTIONS

~~PROPOSED~~ **ORDER ON OMNIBUS
SEALING STIPULATION
REGARDING DKT. NOS. 1197-1198
(JOINT LETTER BRIEF RE
PLAINTIFFS' RFP NOS. 16 AND 18)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

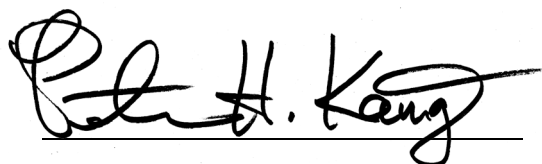
Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341), and after consideration of the moving papers, supporting declaration, the arguments of counsel, and all other matters presented to the Court, the Court rules that good cause exists to seal portions of the following documents relating to Joint Letter Brief re Plaintiffs' RFP Nos. 16 and 18:

Dkt. No.	Description	Requested Action	Court's Ruling
1197	Joint Letter Brief	Maintain redactions at 2, 4	Granted <u> x </u> Denied <u> </u>

Dkt. No.	Description	Requested Action	Court's Ruling
1197	Joint Letter Brief	Maintain redactions at 1	Granted <u> x </u> Denied <u> </u>
1198-3	Exhibit A to Joint Letter Brief	Maintain redactions at 16:9-10, 16-17	Granted <u> x </u> Denied <u> </u>

IT IS SO ORDERED.

DATE: October 22, 2024



Hon. Peter H. Kang
United States Magistrate Judge